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7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**  
9 **AT SEATTLE**

9 UNITED STATES OF AMERICA, )  
10 Plaintiff, )  
11 v. )  
12 VICTOR HUGO GUTAMA, )  
13 a/k/a Hugo Gutama, )  
14 Defendant. )

No.: 2:18-cv-00175-RSL

**SECOND STIPULATED MOTION AND  
PROPOSED ORDER TO CONTINUE STAY**

**NOTE ON MOTION CALENDAR: 8/31/2018**

15 The United States of America ("United States" or "Plaintiff") and Victor Hugo Gutama,  
16 also known as Hugo Gutama ("Defendant"), (together, the "Parties") stipulate and jointly move,  
17 pursuant to W.D. Wash. LCR 10(g), for entry of an order continuing to stay all proceedings and  
18 deadlines in this matter for an additional 14 days, until September 17, 2018. In support of their  
19 request, the Parties state the following:

- 20 1. On February 5, 2018, Plaintiff filed a Complaint to Revoke Naturalization under 8  
21 U.S.C. § 1451(a), seeking, *inter alia*, judgment revoking and setting aside  
22 Defendant's naturalization and cancelling his certificate of naturalization. Dkt. # 1.  
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1           2. On April 9, 2018, pursuant to the Parties' stipulated motion, the Court entered an  
2           Order staying all proceedings and deadlines in this matter. Dkt. ## 10, 11. The stay  
3           was granted to provide the Parties with additional time to engage in discussions  
4           concerning whether this case might be resolved without further litigation and, if  
5           necessary, seek appropriate approval for any agreement. Dkt. # 10 at ¶ 4. The Court  
6           subsequently entered an Order continuing the stay for an additional 60 days, pursuant  
7           to the Parties' stipulated motion requesting additional time to work toward a potential  
8           resolution. Dkt. ## 13, 14.

9           3. Although the Parties have been trying to determine whether this case might be  
10          resolved without further litigation, they require an additional brief continuance of the  
11          stay to work toward a potential resolution. Specifically, the Parties request that this  
12          matter be stayed for an additional 14 days, at which time they propose to file a motion  
13          to govern further proceedings or file a status report updating the Court of any  
14          developments with a proposal to govern further proceedings.

15          WHEREFORE, the Parties request that the Court grant this stipulated motion and  
16          continue to stay all proceedings and deadlines in this matter for an additional 14 days, until  
17          September 17, 2018, at which time the Parties propose to file a motion to govern further  
18          proceedings or file a status report updating the Court of any developments with a proposal to  
19          govern further proceedings.

20          Dated: August 31, 2018

21          Respectfully submitted,

22          /s/ Jay Gairson (by TMP w/ permission)  
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23 **Attorneys for the United States**

24 **DATED: Sept. 6, 2018.**  
IT IS SO ORDERED.

  
Hon. Robert S. Lasnik  
UNITED STATES DISTRICT JUDGE